

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PERVAIZ QURESHI,

Plaintiff,  
-against-

NOTICE FOR DISCOVERY  
AND INSPECTION

YURIY A. DRON, LARISA MAGALYUR  
and FAST TRACK, LLC,

Docket No.: 08 CV 00246

Defendants.

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C O U N S E L O R :

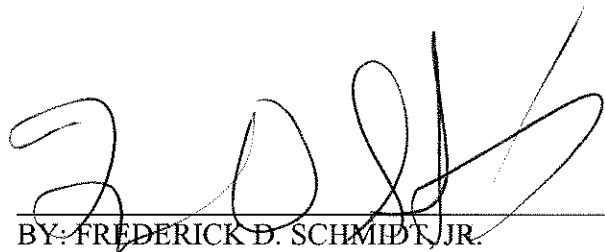
PLEASE TAKE NOTICE, pursuant federal rules of civil procedure, you are required to produce to this office, within thirty (30) days of service hereof, the following:

1. Full name and last known address of the individual who came to the scene of your client's accident and his position and whether or not he is a doctor. The individual had picked up the brain as testified by your client, when your client was taken away in an ambulance.
2. Full and complete HIPPA compliant authorizations to obtain all of the medical records and reports including all diagnostic testing and recommendations by Dr. Elamir, Magsday, concerning any laminectomy or any treatment up to date of your client.
3. Full and complete HIPPA compliant authorizations to obtain duplicate originals of the MRI films taken of your client at Jacobi Medical Center, including the Ct Scans as well as all MRI films taken subsequent to the hospital admission specifically to your client's neck and back as a result of the August 2, 2006, accident.
4. Full and complete HIPPA compliant authorization to obtain the no fault records from Liberty Mutual Insurance Co., located at Park 80 Plaza East, Saddlebrook, New Jersey, 07662, claim no.: 5789957, policy no.: AB1331119383004T18.

5. Full and complete HIPPA compliant authorization to obtain all updated medical records and reports of the physical therapy treatment that your client was receiving, from Dr. Chennye, including all visits to the chiropractor there as well.
6. Full and complete HIOPPA compliant authorizations to obtain the pharmacy records concerning the Motrin, Naprocin and Selaxin, that your client took as a result of the injuries sustained from the accident, including the full name and last known address of the pharmacy dispensing said prescription.
7. Full name and last known address and also a HIPPA compliant authorization to obtain all of the prior records of Dr. Adubaker, that treated your client for Diabetes, including an authorization for the medication he took, Gluvance for the condition as well as any other doctor that treated him for this diabetic condition prior to August 2, 2006.

PLEASE TAKE NOTICE, that if the above is not forthcoming, a motion to compel its compliance will be made.

Dated: New York, New York  
August 18, 2008



BY: FREDERICK D. SCHMIDT, JR.  
LAW OFFICE OF JOHN P. HUMPHREYS  
Attorneys for Defendants  
485 Lexington Avenue, 7<sup>th</sup> Floor  
New York, NY 10017  
(917) 778-6600

TO:

OMRANI & TAUB, P.C.  
Plaintiff Counsel  
535 Fifth Avenue, 23<sup>rd</sup> Floor  
New York, New York 10017  
(212) 599-5550

STATE OF NEW YORK  
COUNTY OF NEW YORK

AFFIDAVIT OF SERVICE  
BY MAIL

I, MARIA PIZZO, being duly sworn, deposed and says that deponent is a secretary of the LAW OFFICE OF JOHN P. HUMPHREYS, attorneys for one of the parties herein; is over 18 years of age; is not a party to the action. The deponent served the papers noted below by regular mail, the same securely enclosed in the postage paid wrapper in the Letter Box maintained and exclusively controlled by the United States Postal Service at 485 Lexington Avenue, 7<sup>th</sup> Floor, New York, NY 10017; directed to the said attorney(s) at the address indicated below; that being the address within the state designated by said attorney(s) for that purpose, or the place where said attorneys(s) then kept an office, between which places there then was and now is a regular communication by mail as follows:

Date mailed: August 18, 2008

Papers Served: NOTICE FOR DISCOVERY AND INSPECTION

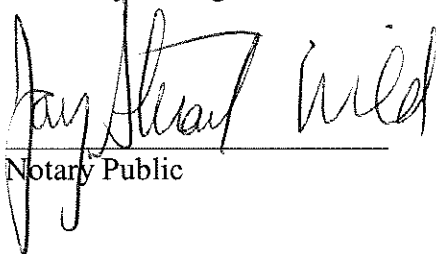
TO:

OMRANI & TAUB, P.C.  
Attorneys for Plaintiff  
535 Fifth Avenue / 23<sup>rd</sup> Floor  
New York, New York 10017  
(212) 599-5550

  
MARIA PIZZO

Sworn to before me this

18<sup>TH</sup> day of August, 2007

  
Notary Public

JAY STUART WILD  
Notary Public, State of New York  
No. 01WI4978093  
Qualified in Queens County  
Commission Expires 02/25/2011

2011

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SOUTHERN DISTRICT OF NEW YORK**

**08 CV 00246**

**PERVAIZ QURESHI,**

**Plaintiff,**

**-against-**

**YURIY A. DRON, LARISA MAGALYUR  
AND FAST TRACK, LLC,**

**Defendants.**

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**NOTICE FOR DISCOVERY AND INSPECTION**

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**Law Office of  
JOHN P. HUMPHREYS**

Attorneys for Defendant  
**YURIY A. DRON, LARISA MAGALYUR AND  
FAST TRACK, LLC**

Office & P.O. Address  
**485 Lexington Avenue, 7<sup>th</sup> Floor  
New York, New York 10017**

Tel. No.: (917) 778-6600

Fax No.: (917) 778-7020

(917) 778-7022

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TO:

Service of a copy of the within

is hereby admitted.

Dated:

\_\_\_\_\_  
Attorney(s) for Defendants

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**NOTICE OF ENTRY:**

**PLEASE TAKE NOTICE** that the within is a true copy of an order entered in office of the Clerk of the above Court on the \_\_\_\_ day of \_\_\_\_\_ 200 .

**NOTICE OF SETTLEMENT:**

**PLEASE TAKE NOTICE** that the within proposed order will be presented for settlement and entry at the Courthouse on the \_\_\_\_ day of \_\_\_\_\_ 200 , at 10:00 a.m. at the office of the Clerk of the Part of this Court where the within described motion was heard.

Dated: New York, New York

**Law Office of  
JOHN P. HUMPHREYS**  
Attorneys for Defendant(s)  
As Designated Above